



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

April 7, 2016

RANDY A. UDELL, TREASURER  
DEMOCRATIC PARTY OF WISCONSIN  
15 N. PINCKNEY SUITE 200  
MADISON, WI 53703

**Response Due Date**

**05/12/2016**

IDENTIFICATION NUMBER: C00019331

REFERENCE: YEAR-END REPORT (12/01/2015 - 12/31/2015)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. Schedule A of your report (see attached) discloses one or more contributions from an organization(s), which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 52 U.S.C. § 30116(f) and 30118 (formerly 2 U.S.C. §§441a(f) and 441b) or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

To the extent that your committee has received prohibited funds, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided

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written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. (11 CFR §103.3(b)(1))

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of your check for any transfer- out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

**2.** Your 2015 Reports combined discloses memo Schedule A's totaling \$69,517.93 for "WI Party Victory Fund" which appears to be your committee's share of the gross contributions received from a joint fundraising committee. However, there are no corresponding transfers-in from the related joint fundraising committee disclosed on Schedule A supporting Line 12 of the Detailed Summary Page. Please amend your report(s) to clarify this apparent discrepancy. (11 CFR §102.17(c)(8)(i)(B))

**3.** Your Amended November Monthly (10/1/15-10/31/15), received 1/25/16, Amended December Monthly (11/1/15-11/30/15), received 3/16/16, and Year-End (12/1/15-12/31/15) Reports combined do not disclose any payments for salary or wages on Schedule B supporting Line 30(b) of the Detailed Summary Page. 11 CFR §100.24 defines as Federal Election Activity, services provided by an employee of a State, district or local party committee who spends more than 25 percent of their time during that month on activities in connection with a Federal election. You are advised that payments for salaries and wages for employees who spend more than 25 percent of their compensated time in a given month on Federal Election Activity or activities in connection with a Federal election must be made with Federal funds only. Please provide clarification regarding the lack of payments for salary and wages disclosed by your committee.

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**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1143.

Sincerely,



Kaitlin Seufert  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

**Impermissible, Excessive, and Prohibited Contributions  
Democratic Party of Wisconsin (C00019331)**

**Contributions from Unregistered Organizations**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
Buffalo County Democratic Party	12/7/15	\$76.85	2015 Year-End
Winnebago County Democratic Party	12/7/15	\$295.00	2015 Year-End
Amanda For Assembly	12/31/15	\$1,000.00	2015 Year-End
Citizens for Peter Barca	12/31/15	\$1,000.00	2015 Year-End
Forward With Jocasta	12/18/15	\$1,000.00	2015 Year-End
Friends of Andy Jorgensen	12/31/15	\$1,000.00	2015 Year-End
Friends of Beth Meyers	12/18/15	\$1,000.00	2015 Year-End
Friends of Chris Taylor	12/18/15	\$1,000.00	2015 Year-End
Friends of Christine Sinicki	12/18/15	\$1,000.00	2015 Year-End
Friends Of Deb Colste	12/18/15	\$1,000.00	2015 Year-End
Friends of Eric Genrich	12/31/15	\$1,000.00	2015 Year-End
Friends of Gary Hebl	12/18/15	\$1,000.00	2015 Year-End
Friends of Jonathan Brostoff	12/31/15	\$1,000.00	2015 Year-End
Friends of Katrina Shankland	12/10/15	\$1,000.00	2015 Year-End
Friends of Leon D. Young	12/31/15	\$1,000.00	2015 Year-End
Friends of Sindy Pope-Roberts	12/18/15	\$1,000.00	2015 Year-End
Friends of Terese Berceau	12/31/15	\$1,000.00	2015 Year-End
Goyke for Assembly	12/31/15	\$1,000.00	2015 Year-End
Lisa Subeck for City Council	12/31/15	\$1,000.00	2015 Year-End
Milroy for Assembly	12/18/15	\$1,000.00	2015 Year-End